

Exhibit 1

Tuesday, October 15, 2024 at 11:29:00 Eastern Daylight Time

Subject: Rapaport v. Finkelman, 1:24-cv-05942-JGLC (S.D.N.Y.)
Date: Friday, September 27, 2024 at 8:37:56 AM Eastern Daylight Time
From: Max Rodriguez
To: gideonrapaportlaw@outlook.com
CC: Richard A. Altman
Attachments: image001[91].png, 2024.09.27 Finkelman Rule 11(c)(2) Letter with Enclosure.pdf

Dear Mr. Rapaport,

I represent Abigail Finkelman in the above-captioned case, and now that you are representing yourself *pro se*, am contacting you directly in that capacity. If at any time you obtain new counsel that comes to represent you in this matter, please inform me or have them contact me so I may direct my communications appropriately.

Attached to this email is a letter and enclosed proposed motion for sanctions against you and your former counsel Mr. Altman (who is copied on this email). This letter and enclosed proposed motion constitute pre-filing service of the motion under Rule 11(c)(2), and the grounds for the motion are discussed therein. Per Rule 11(c)(2), if the challenged paper and claims (i.e., your complaint) are dismissed with prejudice within the 21-day safe harbor period, this motion will not be filed.

Ms. Finkelman reserves all rights and remedies with respect to you and Mr. Altman.

Sincerely,

MAX RODRIGUEZ
Principal and Founder
(he/him/his)



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